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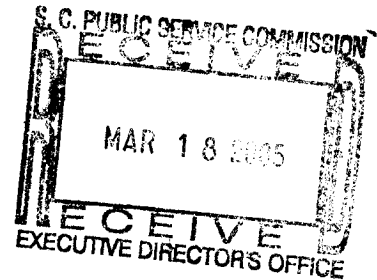
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March 17, 2005

Mr. Charles L. A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210



**Re: Application of Time Warner Cable Information Services (South Carolina), LLC d/b/a Time Warner Cable to amend its Certificate of Public Convenience and Necessity to Provide Interexchange and Local Voice Service Areas of Certain Incumbent Carriers who Currently have a Rural Exemption  
Docket No. 2004-280-C**

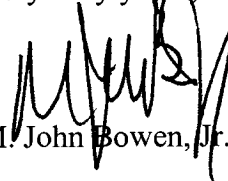
Dear Mr. Terreni:

Enclosed for filing please find an original and twenty-five (25) copies each of the Testimony of H. Keith Oliver and Emmanuel Staurulakis in the above-captioned matter. By copy of this letter and Certificate of Service, all parties of record are being served with one (1) copy of each of the testimonies via U. S. Mail.

Please clock in a copy and return it to us in the self-addressed, stamped envelope provided.

Thank you for your assistance.

Very truly yours,

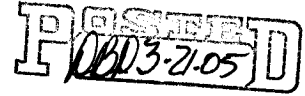


M. John Bowen, Jr.

MJB/rwm  
Enclosures

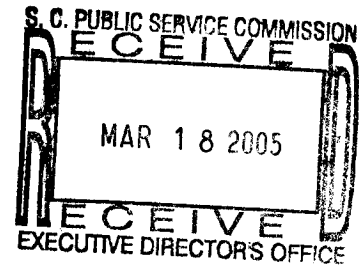
cc: Parties of Record

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BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION

TESTIMONY OF  
H. KEITH OLIVER  
DOCKET NO. 2004-280-C



1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is H. Keith Oliver. My business address is 579 Stoney Landing Road,  
3 Moncks Corner, South Carolina 29461.

4

5 Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?

6 A. I am employed by Home Telephone Company, Inc. as the Company's Vice  
7 President of Finance.

8

9 Q. PLEASE BRIEFLY OUTLINE YOUR EDUCATION, TRAINING, AND  
10 EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY?

11 A. I received a Bachelor of Science degree in Business Administration from the  
12 College of Charleston in May 1977. After being licensed as a Certified Public  
13 Accountant in May of 1979, I continued work in public accounting until October  
14 of 1984 when I was hired in the finance area at Home Telephone Company. In  
15 December of 1999, I was named Vice President of Finance. In this position, I  
16 am responsible for all financial matters, including Carrier Access Billing  
17 Systems (CABS) for interLATA traffic, National Exchange Carrier Association

OK DDD  
OK DDD

1 (NECA) settlements for interstate traffic, and the settlement process for  
2 intraLATA toll. I have served on several South Carolina Telephone Association  
3 (SCTA) committees, including previously serving as Chairman of the SCTA  
4 Accounting Committee and Interconnect Committee.

5 I am also associated with several national organizations. I serve as a board  
6 member for the Organization for the Promotion and Advancement of Small  
7 Telecommunications Companies (OPASTCO). OPASTCO is an international  
8 trade organization representing over 500 small incumbent local exchange  
9 carriers serving primarily rural areas throughout the United States and portions  
10 of Canada. I serve on OPASTCO's Separations and Access Committee as well  
11 as their Universal Service Committee, the Committee which developed the  
12 recently published white paper entitled Universal Service in Rural America: A  
13 Congressional Mandate at Risk. In addition I currently serve as chairman of the  
14 United States Telecom Association (USTA), Small Company Caucus which  
15 represents over 500 small member companies of USTA. I also serve on  
16 USTA's telcom policy committee which is responsible for establishing the  
17 overall telecommunications policy positions for USTA and previously served on  
18 USTA regulatory tactics committee which is responsible for representing  
19 USTA's positions before the Federal Communication Commission (FCC). I  
20 have appeared before this Commission many times in the past to present  
21 testimony on behalf of the SCTA and the South Carolina Telephone Coalition  
22 (SCTC), including many recent appearances before this Commission testifying  
23 on various Universal Service Funding and other issues.

1 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING TODAY BEFORE THIS**  
2 **COMMISSION?**

3 **A.** I am presenting testimony today on the behalf of Home Telephone Company,  
4 Inc., Farmers Telephone Cooperative, Inc., Fort Mill Telephone Company, d/b/a  
5 Comporium Communications, Inc., PBT Telecom, Inc., St. Stephen Telephone  
6 Company (the "Rural LECs") and the South Carolina Telephone Coalition  
7 ("SCTC"), an informal organization of incumbent local exchange carriers  
8 ("ILECs") certified in the State of South Carolina.

9  
10 **Q. WHAT ARE THE RURAL LECS AND THE SCTC ASKING THE**  
11 **COMMISSION TO DO IN THIS MATTER?**

12 **A.** Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") has  
13 asked the Commission to expand its certificated authority to provide service in  
14 five additional areas served by the Rural LECs. On the behalf of the Rural  
15 LECs and the SCTC, I am respectfully requesting that the Commission deny  
16 TWCIS' request because it is not in the public interest and because of its  
17 adverse impact on the availability of affordable local exchange service as I  
18 explain in more detailed below.

19  
20 **Q. WHAT IS VOIP?**

21 **A.** VoIP stands for "Voice Over Internet Protocol." From a customer's standpoint,  
22 the kind of VoIP service TWCIS proposes to provide is really no different from  
23 traditional telephone service. The customer picks up a telephone and places a

1 local or long distance call and talks to someone on the other end. What  
2 distinguishes "VoIP" service from existing telephone service is how that voice  
3 message is transmitted. With VoIP service, internet protocol is used  
4 somewhere along the path of that call.

5  
6 **Q. DOES THE TERM "VOIP" REFER TO A SINGLE SERVICE?**

7 **A.** No. The term "VoIP" can be used to describe any of several completely  
8 different services using Internet Protocol (IP) signaling. One type of VoIP call is  
9 a computer-to-computer public Internet-routed call where a broadband  
10 connection is used on both ends and the call does not touch the Public  
11 Switched Telephone Network (PSTN). A second type of VoIP call is where  
12 carriers are simply using IP as the transmission medium within their networks  
13 as an internal technology choice, with the call originating and terminating on the  
14 PSTN. A third type is when a VoIP call originates on the public Internet over a  
15 broadband connection and terminates over the PSTN or vice versa. Finally, a  
16 VoIP call can originate on a private IP network and terminate on the PSTN or  
17 vice versa. In this last example, which appears to be the one that describes  
18 TWCIS' service, the use of IP signaling is again an internal technology choice.  
19 The last three types of calls utilize a portion or portions of the PSTN for their  
20 completion. When they reach the ILEC network, they have been converted to  
21 voice communication at some point in the network and the ILEC switch cannot  
22 distinguish the VoIP call from any other terminating call. As such, all applicable  
23 charges should apply on the originating or terminating end of the call.

1    **Q.    DID THE FCC PREEMPT STATE REGULATION OF VOIP SERVICES IN ITS**  
2    **“VONAGE ORDER”?**

3    Not necessarily all VoIP services. The FCC preempted the Minnesota Public  
4    Utilities Commission in its “Vonage Order<sup>1</sup>”, and extended its preemption to  
5    “other services having the same characteristics as DigitalVoice [Vonage’s VoIP  
6    service.]” The FCC went on to state that it would preempt state regulation of  
7    VoIP services provided by “other entities, such as cable companies . . . *to an*  
8    *extent comparable*” to what it did in the Vonage Order (my emphasis added).  
9    However, the FCC was very explicit in delineating those characteristics that it  
10   found justified preemption. TWCIS has not demonstrated that its VoIP product  
11   has the same characteristics as Vonage’s DigitalVoice service to justify state  
12   preemption. The FCC preempted the state commissions with respect to  
13   Vonage-like services, based on a finding that “provision of tightly integrated  
14   communications capabilities greatly complicates the isolation of intrastate  
15   communications and counsels against patchwork regulation.” However, it  
16   appears that TWCIS service is location specific and can be used only in the  
17   location where the service is ordered. Therefore, there is no jurisdictional issue  
18   related to this service. While we do not believe the Commission is preempted  
19   from regulating TWCIS, if the Commission finds that it is preempted by the  
20   FCC’s Vonage Order, the Commission should dismiss TWCIS’ petition.

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<sup>1</sup> See FCC Memorandum Opinion and Order in WC Docket. No. 03-211, released November 12, 2004 in the Matter of Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission.

1 **Q. WHAT IS THE SIGNIFICANCE OF THE FACT THAT MOST VOIP CALLS**  
2 **UTILIZE THE PSTN?**

3 **A.** TWCIS makes much of the fact that it has upgraded 98% of its cable plant to be  
4 two-way capable in order to provide facilities-based competition. What TWCIS  
5 glosses over, however, is the fact that most VoIP calls rely on the PSTN to  
6 make the service work, and the PSTN has been built and maintained by  
7 telecommunications companies. While TWCIS has built cable facilities in areas  
8 that it deems profitable from a business standpoint, the PSTN has been built  
9 with the goal of providing ubiquitous telephone service throughout the United  
10 States to provide universal service. TWCIS needs the PSTN to make its VoIP  
11 service work. It is essential to recognize that without the PSTN, TWCIS' VoIP  
12 customers can only call other VoIP customers and not customers on the PSTN.  
13

14 **Q. BASED ON ITS TESTIMONY, DOES IT APPEAR TWCIS IS WILLING TO**  
15 **COMPENSATE OTHER CARRIERS FOR TWCIS' USE OF THE PSTN?**

16 **A.** Not really. TWCIS claims that it currently terminates calls to the PSTN through  
17 relationships with competitive local exchange companies ("CLECs") and only  
18 makes the general statement that calls destined for the PSTN are terminated in  
19 accordance with the inter-carrier compensation regime. TWCIS should be  
20 required to pay access or appropriate compensation for its use of other carriers'  
21 facilities and ensure that important public policy goals like universal service are  
22 not threatened by the provision of TWCIS' service. If VoIP providers are  
23 permitted to use the PSTN and not pay for its use, who will pay to maintain and

1 upgrade the network? The burden for doing so will increasingly fall on the  
2 customers "left behind," – i.e. those more rural and insular customers who are  
3 costly to serve and don't have competitive options. While TWCIS states that it  
4 will voluntarily pay access until such time as issues relating to IP-enabled  
5 services are resolved at the federal level, we feel that this issue is an integral  
6 part of the public interest determination during the certification process.  
7 TWCIS' request should be denied, given the uncertainty in this area and the  
8 potentially devastating impact it could have on customers in rural areas if a  
9 carrier is permitted to provide service and later stops compensating other  
10 carriers for use of the PSTN.

11  
12 **Q. WHAT ARE SOME OF THE FACTORS THE COMMISSION SHOULD**  
13 **CONSIDER IN EVALUATING TWCIS' PETITION?**

14 **A.** State law provides that, in determining whether or not to grant a certificate to a  
15 carrier seeking to furnish local telephone service in the service territory of an  
16 incumbent LEC, the Commission should take a number of factors into  
17 consideration. See S.C. Code Ann. § 58-9-280(B). In addition to making  
18 findings regarding the sufficiency of the applicant's technical, financial and  
19 managerial resources, the Commission may require the applicant to meet the  
20 Commission's service standards for the service to be provided and to  
21 participate in the support of universally available telephone service at affordable  
22 rates. In addition, the Commission may require a showing that the service to  
23 be provided will not adversely impact the availability of affordable local



1 exchange service and that provision of the service will not otherwise adversely  
2 impact the public interest.

3  
4 **Q. HAS TWCIS DEMONSTRATED THAT PROVISION OF THE SERVICE WILL**  
5 **NOT ADVERSELY IMPACT THE AVAILABILITY OF AFFORDABLE LOCAL**  
6 **EXCHANGE SERVICE?**

7 **A.** No, it has not. As demonstrated in my testimony, the selective provision of  
8 service by TWCIS will likely have an adverse impact on the availability of  
9 affordable local exchange service particularly in areas served by rural  
10 telephone companies. In fact, Ms. Patterson's testimony clearly states that  
11 TWCIS intends to withdraw its retooled tariff offering once a new non-regulated  
12 entity is created to provide the retail voice services currently being offered. As  
13 a result, TWCIS would not contribute to state & federal universal service funds  
14 as non-regulated revenues are most likely not assessed such contributions.

15  
16 **Q. ARE THERE ADDITIONAL FACTORS THAT SHOULD BE CONSIDERED BY**  
17 **THE COMMISSION IN EVALUATING THIS APPLICATION?**

18 **A.** Yes. The Commission should respectfully take notice that TWCIS is not a start-  
19 up company that is trying to enter the rural marketplace, but a highly  
20 specialized company that has the potential to drastically impact the provision of  
21 telecommunications services in South Carolina within a very short time frame.  
22 TWCIS, according to its own information, provides service to more than 68,000  
23 high-speed data customers in South Carolina. However, these numbers pale

1 when compared to the fact that its cable service and, therefore, potentially its  
2 VoIP service, passes more than 588,000 homes within South Carolina, which is  
3 more than one-third of the 1,534,000 total households in the State. In addition,  
4 TWCIS is the nation's second largest cable company with nearly 11 million  
5 customers and it passes more than 18 million homes with 3 million broadband  
6 customers in 27 states.

7  
8 **Q. COULD TWCIS' PROVISION OF TELEPHONE SERVICE HAVE AN**  
9 **ADVERSE IMPACT ON RURAL AREAS?**

10 **A.** Yes. Rural portions of our state tend to have a relatively low population  
11 density. However, within most rural service areas, there are usually small  
12 towns or communities that form small pockets of higher density. As an  
13 example, my company, Home Telephone, serves approximately 903 square  
14 miles with an average population density of a little less than 26 customers per  
15 square mile. However, when you examine our service area in detail, you find  
16 that almost 60% of our subscribers reside in less than 5% of our service area.  
17 This drops the population density to less than 12 subscribers per square mile  
18 for the balance of our service area. In contrast, the portion of our service area  
19 that TWCIS currently serves has an average population density of 120  
20 subscribers per square mile.

1   **Q.    WHY IS POPULATION DENSITY IMPORTANT?**

2   **A.**   Population density is a good indicator of cost. One of the main cost drivers for  
3       rural LECs is loop length. The loop is the facility between the serving central  
4       office and the end user's house. In sparsely populated areas, there are fewer  
5       customers per mile and many miles between the central office and the  
6       customer. This creates rural loop costs many times higher than that found in  
7       urban areas. In fact, the FCC itself has recognized that rural loop cost can be  
8       up to 100 higher than in urban areas.<sup>2</sup>

9

10   **Q.   HOW DOES THIS RELATE TO THE TWCIS APPLICATION?**

11   **A.**   As stated earlier, TWCIS generally only has facilities in the more populated  
12       areas of rural companies. The areas they would serve tend to be in the least  
13       costly to serve and therefore most profitable portions of a rural carrier's  
14       services territory. The impact of the TWCIS' application could be the loss of a  
15       rural company's lower cost customers, leaving the rural LEC with only higher  
16       cost customers to serve.

---

<sup>2</sup> *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, Second Report and Order and Further Notice of Proposed Rulemaking, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Fifteenth Report and Order, *Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation*, CC Docket No. 98-77, Report and Order, *Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, CC Docket No. 98-166, Report and Order, 16 FCC Rcd 19613, 19636, para. 45 (2001).

1   **Q.    WHY WOULD THIS HAVE A NEGATIVE IMPACT ON THE CUSTOMERS**  
2       **REMAINING IN THE RURAL LEC'S SERVICE AREA?**

3   **A.**   Rural companies, like our urban counterparts, normally charge an average rate  
4       per subscriber. In effect, subscribers in high-density areas help offset the cost  
5       of serving subscribers in low-density areas. The loss of the lower cost, high-  
6       density customers would have the results of leaving a higher cost to spread  
7       over a smaller customer base. In effect, the average cost of service goes up  
8       across the entire service area.

10   **Q.    HAVE YOU CALCULATED THE POSSIBLE IMPACT TO YOUR COMPANY**  
11       **IF TWCIS WERE TO BE CERTIFIED TO SERVE IN YOUR SERVICE AREA?**

12   **A.**   Yes. Currently we estimate TWCIS' facilities pass approximately 1,700 of our  
13       subscribers. If we were to lose these subscribers to TWCIS' VoIP service, it  
14       would result in the loss of approximately \$1.6 million in annual revenue. It is  
15       important to note that the loss in revenue would not result in any real decrease  
16       in cost. In fact, as carriers of last resort who have an obligation to serve all  
17       requesting customers, we would be left with telephone plant that we would be  
18       required to leave in place in the event the current customer or a new customer  
19       in that location decided that they wanted to obtain service again from the LEC.  
20       In the meantime, there is no revenue being generated from the facilities while  
21       they stand dormant. Thus, the overall net impact could be an average  
22       decrease in revenues amounting to almost seven dollars per subscriber per  
23       month, which would have to be recovered from our remaining subscribers. This

1 assumes no subscriber increase or expansion in TWCIS' service area. Should  
2 TWCIS expand to other portions of our service area that have higher densities  
3 and lower cost, the cost per remaining subscriber could spiral upward very  
4 quickly. The example given is just for one rural telephone company in South  
5 Carolina. Other rural telephone companies could potentially be even more  
6 severely impacted.

7  
8 **Q. ARE THERE CONCERNS ASSOCIATED WITH THE TYPE OF LIMITED**  
9 **DEPLOYMENT OF A FACILITIES-BASED NETWORK THAT TWCIS**  
10 **PROPOSES?**

11 **A.** Yes. There may be service areas where economies of scale make it difficult for  
12 even one service provider to operate. Cream skimming in such areas could  
13 leave some customers with no service at all. The current cable TV service  
14 model does just this. Cable TV companies build out their systems to reach  
15 those customers that are profitable to serve. Is there a risk that the current  
16 model of ubiquitous telephone service could be replaced by the cable TV  
17 model? This Commission has both a right and a duty to ensure that all  
18 subscribers have access to affordable basic telephone service. The only way  
19 this can be done is to insure a viable carrier of last resort in all areas of the  
20 state. TWCIS is not proposing to deploy a ubiquitous network in South  
21 Carolina, and in the rural areas only the incumbent rural telephone companies  
22 have been willing to take on that obligation. We, as rural companies, have to  
23 face the same difficult policy questions that this Commission faces. Do we

1       disadvantage the vast majority of rural customers to bring small benefits to the  
2       few? In our case, the approval of this petition could result in small savings to  
3       less than 7% of subscriber base. However, the net result could be in the form  
4       of increased rates to the remaining 93%.

5  
6   **Q.    DOES A VOIP SERVICE PROVIDE A MEANINGFUL ALTERNATIVE TO ALL**  
7   **CUSTOMERS IN THE AFFECTED RURAL AREAS?**

8   **A.**   Definitely not. First of all, TWCIS VoIP service branded as Digital Phone will  
9       only be available where Time Warner Cable provides High-Speed Internet or its  
10      Cable Service. Additionally, given the current average tariffed monthly  
11      residential rate of \$14.35 for basic telephone service compared to TWCIS rate  
12      of \$39.95 to \$49.95 for its Digital Phone service, a simple financial analysis  
13      indicates that only customers with an average toll bill of \$25 would be likely to  
14      be attracted to TWCIS' VoIP service offering. Furthermore, before TWCIS will  
15      offer VoIP service, the customer must also subscribe to Time Warner Cable  
16      High-Speed Internet or Basic Cable.

17  
18   **Q.    DOES TWCIS CLAIM OTHER REGULATORY BENEFITS NOT AVAILABLE**  
19   **TO SC RURAL LECS?**

20   **A.**   Yes. TWCIS intends to provide service on an IP or internet protocol basis. IP  
21       is ideally suited to data services. Recent technology advances have made it  
22       possible to transport voice over this service. This is another case of technology  
23       moving faster than regulations. There are many unanswered questions as to

1        how VoIP will be regulated, if at all. In fact, TWCIS in its application and in the  
2        testimony of Ms. Patterson issues a “regulatory disclaimer” noting that “TWCIS  
3        does not want anything in the application or docket to be construed as a  
4        concession or agreement by TWCIS that the services at issue constitute  
5        telecommunications services, local exchange services, common carrier  
6        offerings, or services that are otherwise subject to federal or state regulations.”  
7

8        **Q.    DOES THE SCTC OPPOSE THE INTRODUCTION OF NEW**  
9        **TECHNOLOGIES AND SERVICES IN THE RURAL AREAS OF SOUTH**  
10       **CAROLINA?**

11      **A.**    No. Along with technological innovation comes exciting new services and  
12       perceived cost savings. VoIP has come a long way since its introduction to the  
13       general public and it is widely used in a number of locations and variations.  
14       Member Companies of the SCTC have always tried to remain on the cutting  
15       edge of technology in their deployment of services. No member or members of  
16       SCTC have a desire to preclude any party from deploying the latest technology  
17       to citizens of South Carolina that will serve to enrich their lives. SCTC  
18       members have deployed a network that has as its primary goal to serve each  
19       and every customer within its area of service. SCTC member companies  
20       recognize and appreciate this obligation.

21                There is a strong desire to see that any new service that is introduced  
22       recognizes that the public policy of Universal Service must be adhered to and

1 any new provider must recognize the importance of Universal Service and not  
2 just mention the obligation with the intention of skirting their responsibilities.

3 TWCIS in South Carolina has indicated that they will follow the rules as long as  
4 there are rules in place that apply to them, but if there are no rules or if TWCIS  
5 can argue that the rules do not apply to them, then they feel there is no  
6 obligation and they may escape all responsibility to the customers of South  
7 Carolina. A main point that is missed many times is that all rural customers are  
8 entitled to affordable service; a fact new entrants fail to be fully cognizant of in  
9 their provision of services that compete with the incumbent.

10  
11 **Q. SHOULD VOIP PROVIDERS CONTRIBUTE TO UNIVERSAL SERVICE?**

12 **A.** Yes. VoIP service requires the use of the local loop and, therefore, all VoIP  
13 providers should be required to contribute to USF to help make services  
14 available and affordable for everyone.

15  
16 **Q. WHY IS IT IMPORTANT FOR THE COMMISSION TO ADDRESS PUBLIC**  
17 **POLICY ISSUES RELATED TO VOIP SERVICES?**

18 **A.** A key question in considering whether the provision of VoIP service is in the  
19 public interest for South Carolinians is whether or not the provision of the  
20 service will lessen or exacerbate the "digital divide" between rural and urban  
21 customers. If key public policy issues are not fully and adequately addressed  
22 prior to allowing the provision of such service, the divide will almost certainly  
23 get wider.



1 **Q. DOESN'T TWCIS' APPLICATION AND TESTIMONY INDICATE THAT**  
2 **TWCIS WILL ABIDE BY APPROPRIATE RULES AND PUBLIC INTEREST**  
3 **POLICIES?**

4 **A.** TWCIS says they will support universally available telephone service at  
5 affordable rates but, as always, the devil is in the details. If the Commission  
6 examines TWCIS' statements in detail, it will see the inconsistencies. For  
7 example, TWCIS states it will comply with applicable Commission requirements  
8 related to universal service obligations, while at the same time expressly states  
9 its intention to move its service offerings to a non-regulated entity. Presumably,  
10 if the state does not regulate TWCIS' service, TWCIS would argue that any  
11 revenues it receives from the provision of VoIP service should not be assessed  
12 for purposes of State USF. In other words, TWCIS argues it will comply with  
13 applicable obligations while at the same time making arguments that suggest  
14 these obligations are not applicable to TWCIS.

15  
16 **Q. SHOULD THE COMMISSION ALLOW TWCIS TO OPERATE IN THE RURAL**  
17 **LEC AREAS OF SOUTH CAROLINA?**

18 **A.** No. We believe there are just too many unresolved issues to allow TWCIS the  
19 approval they seek. As stated, the main reason TWCIS can offer what appears  
20 to be a lower rate for customers with high toll usage is because of unequal  
21 regulatory treatment and the ability to limit service to the more densely  
22 populated service areas. We urge the Commission to deny TWCIS' petition  
23 due to the adverse impact on availability of universal service in the rural areas.

1 TWCIS seeks certification as a telecommunications service provider in order to  
2 obtain interconnection services from ILECs but will not be providing  
3 telecommunications services once it moves its service offering to a non-  
4 regulated entity as stated in Ms. Patterson's testimony & TWCIS' petition.

5  
6 **Q. WHAT DOES SCTC REQUEST THAT THE COMMISSION DO IN THIS**  
7 **MATTER?**

8 **A.** For the reasons provided in this testimony as well as the testimony of Mr.  
9 Staurulakis, Inc., the SCTC respectfully requests that the South Carolina Public  
10 Service Commission deny TWCIS' application due to the important public policy  
11 concerns and the adverse impact on availability of affordable local exchange  
12 service in the rural areas of South Carolina.

13  
14 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

15 **A.** Yes, it does.